

EXHIBIT A

From: Helen Chaitman
To: Klein, Benjamin D.; Crook, Darren; Proano, David; Shifrin, Maximillian S.
Cc: Yavitz, Noah B.
Subject: RE: Picard v. Roth, Adv. Pro. Nos. 10-04324
Date: Monday, February 01, 2016 4:24:23 PM

Thank you very much. I am grateful to you for this. What Baker & Hostetler has done is highly improper.

Helen Davis Chaitman
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From: Klein, Benjamin D. [<mailto:BDKlein@wlrk.com>]
Sent: Monday, February 01, 2016 4:18 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>; Crook, Darren <dcrook@bakerlaw.com>; Proano, David F. (Baker Hostetler LLP) <dproano@bakerlaw.com>; Shifrin, Maximillian S. (mshifrin@bakerlaw.com) <mshifrin@bakerlaw.com>
Cc: Yavitz, Noah B. <NBYavitz@wlrk.com>
Subject: RE: Picard v. Roth, Adv. Pro. Nos. 10-04324

Ms. Chaitman,

JPMorgan will not produce documents in response to this subpoena, which I understood to be held in abeyance, without first providing you with notice. I also refer you to paragraph 34 of our responses and objections, in which JPMorgan objected to producing documents prior to resolution of objections from the Defendants.

Regards,
Ben

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Monday, February 01, 2016 4:05 PM
To: Klein, Benjamin D.; Crook, Darren; Proano, David F. (Baker Hostetler LLP); Shifrin, Maximillian S. (mshifrin@bakerlaw.com)
Cc: Yavitz, Noah B.
Subject: RE: Picard v. Roth, Adv. Pro. Nos. 10-04324

Mr. Klein: Pursuant to an agreement entered in chambers on January 27, Baker & Hostetler has no right to subpoena bank records unless and until it serves discovery on the defendants and the defendants did not admit to transfers to and from Madoff in the years covered by the bank records. In this case, the defendants have not been served with any discovery. Hence, JPMorgan Chase should not have been served with a subpoena and definitely should not produce documents. Please confirm that nothing will be produced without notice to me and an opportunity to seek judicial relief.

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From: Klein, Benjamin D. [<mailto:BDKlein@wlrk.com>]
Sent: Monday, February 01, 2016 11:12 AM
To: Crook, Darren <dcrook@bakerlaw.com>; Proano, David F. (Baker Hostetler LLP)
<dproano@bakerlaw.com>; Shifrin, Maximillian S. (mshifrin@bakerlaw.com)
<mshifrin@bakerlaw.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Yavitz, Noah B. <NB_Yavitz@wlrk.com>
Subject: Picard v. Roth, Adv. Pro. Nos. 10-04324

Counsel,

Please see the attached Responses & Objections on behalf of nonparty JPMorgan Chase Bank, N.A. to the Plaintiff's subpoena in the above-captioned proceedings. We understand that this subpoena is being held in abeyance and the attached Responses and Objections are being served out of an abundance of caution.

Regards,
Ben

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Thank you in advance for your cooperation and assistance.

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